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**Subject:** Almanza v. Jeff Sessions, Case No. 3:15-cv-389 (Hon. Varlan/Hon. Guyton) - Document Collection and Review Update  
**Date:** Monday, October 30, 2017 3:27:00 PM

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Hon. H. Bruce Guyton  
United States District Court, Eastern District of Tennessee  
800 Market Street, Suite 130  
Knoxville, Tennessee 37902

E-mail address: c/o Ms. Holly Nease, [holly\\_nease@tned.uscourts.gov](mailto:holly_nease@tned.uscourts.gov)

RE: Almanza v. Jeff Sessions, Case No. 3:15-cv-389 (Hon. Varlan/Hon. Guyton) - Document Collection and Review Update

Dear Judge Guyton: In preparation for our October 31, 2017 status conference with the Court tomorrow, I am writing to provide an update on Defendant's progress toward finalizing its collection and document review in this case.

Defendant completed an additional document collection based on the Court's September 5, 2017 Order

On September 6, 2017, after receiving the Court's September 5, 2017 Order setting the relevant time frame to January 1, 2012 to December 28, 2014, we asked DOJ's forensic program manager, Michelle Mullinix, to search DOJ's archives for emails belonging to Chris English, Jane Archer, William Killian, and Nancy Harr using the search terms set forth in Plaintiff's July 31, 2017 Proposed Resolution for date range January 1, 2012 to February 28, 2013 for the January 1, 2012 to February 28, 2013, and November 29, 2014 to December 28, 2014 time frames.

On October 20, 2017, Ms. Mullinix completed her collection of emails and transfer to DOJ's Litigation Technology Service Center ("LTSC"), who is tasked with uploading the data collected into Relativity (DOJ's document review platform). Most of those emails have been uploaded into Relativity for our review. The LTSC is still processing 10.80 GB of information, and the associated work order indicates that the documents will be processed no later than November 6, 2017. Once LTSC has finished processing this batch of documents, then we will have completed our collection of documents that are potentially responsive to Plaintiff's discovery requests for the relevant time frame.

Defendant has produced over 5,000 documents since our last status conference with the Court

Since our October 4, 2017 call with the Court, we obtained the help of two additional AUSAs and, last week, a law clerk, to assist with our review. Over 163,000 documents that were responsive to the search terms have been uploaded into Relativity to date for our review. We have culled those documents down in order to filter out mishits (i.e., documents that were responsive to a search term but had no relevance to this case). In less than a month, the review team has reviewed approximately 21,250 documents for responsiveness, and

produced 5,456 documents. To date, DOJ has produced approximately 8,533 documents that are potentially responsive to Plaintiff's discovery requests.

Our next production, which we will ask the LTSC to begin preparing tomorrow, will include just over 3,000 documents. We have approximately 3,837 documents left to review for responsiveness. (This number may increase once the LTSC finishes processing the 10.80 GB of information noted above.) Once we complete our responsiveness review, then we will review the documents that were identified as being subject to a privilege, and we will update our privilege log and provide redacted documents, if appropriate, to Plaintiff's counsel.

Respectfully submitted,

/s Brandi M. Stewart

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